

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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DOUGLAS MARLAND, COSETTE	:	
RINAB, and ALEC CHAMBERS,	:	Civil Action No. 2:20-cv-04597 WB
	:	
Plaintiffs,	:	Oral Argument Requested
	:	
-against-	:	
	:	
DONALD J. TRUMP, in his official	:	
capacity as President of the United States;	:	
WILBUR L. ROSS, JR., in his official	:	
capacity as Secretary of Commerce; and	:	
U.S. DEPARTMENT OF COMMERCE,	:	
	:	
Defendants.	:	
	:	
	:	
	:	
	:	
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**SUPPLEMENTAL DECLARATION OF DOUGLAS MARLAND IN SUPPORT OF
PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

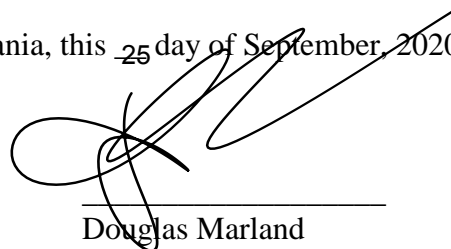
I, Douglas Marland, declare:

1. I am a plaintiff in this case. I have personal knowledge of and am competent to testify to the facts in this declaration.

2. In my first declaration in this matter, I said I had seen a drop in my business since President Trump issued the executive order we are challenging. To elaborate on this, the emails I receive proposing to pay me for videos that include music from 300 Entertainment all contain the following language: "We've added a proviso to keep our clients operating during this time of uncertainty: Posts must be live for a minimum of 72 hours to receive the full fee. If TikTok gets shut down before the post has been live for 72 hours, we will pay you out pro rata." In addition, although I received five offers for videos from 300 Entertainment in each of the months of June and July, I received just three offers in August, and have received only two offers in September. Similarly, for another record company I work with, Empire, I received offers for about two to three songs each month before August, but since then, I have received only one offer.

I declare under penalty of perjury that the foregoing is true and correct.

Signed at Yardley, Pennsylvania, this 25 day of September, 2020.



Douglas Marland